



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400  
NEW YORK, NY 10281-1022

September 21, 2021

**By ECF**

Hon. Kenneth M. Karas  
United States District Court  
United States Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,  
12-CV-6421 (KMK)

Dear Judge Karas:

I write to reply to Defendant Edward Bronson's ("Bronson") opposition to the Securities and Exchange Commission's requests to compel and for sanctions for violating the Court-ordered \$12 million dollar payment schedule to satisfy the Commission's Judgment against him. DEs 272, 284. As background, the payment plan essentially requires Bronson to pay \$1.1 million per month toward the Judgment. DE 272. Bronson made the first payment, due August 13, late, and did not make the second payment, due September 13. Bronson's opposition misses the mark.

Bronson states he will "achiev[e] compliance within the next 30 days." Within 30 days, another payment will be due. Bronson does not indicate how he will achieve compliance or identify sources of funds. Bronson also hints that his contempt could be excused for lack of financial capacity. Yet this was the payment plan to which Bronson agreed.

For these reasons, the Commission respectfully requests that the Court grant the relief the Commission seeks. Specifically, the Commission respectfully requests that the Court require Bronson to: (i) describe in detail the sources of funds for the \$200,000 and \$300,000 payments; and (ii) submit all future payments by wire transfer to avoid any lag time in learning of delinquencies. The Commission also requests that the Court impose any appropriate additional sanctions for Bronson's repeated failure to submit timely payments.

Respectfully submitted,  
s/Maureen Peyton King